

*Reply to:*  
Paul Thanasides  
paul@mcintyrefirm.com

September 9, 2022

**VIA ECF ONLY**

Hon. Brian M. Cogan, U.S.D.J.  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Full Circle United, LLC v. Bay Tek Entertainment, Inc.*, No. 1:20-cv-03395-BMC

Dear Judge Cogan,

Pursuant to the Court's August 10, 2022, directive, Plaintiff and Counterclaim Defendant Full Circle United, LLC and Counterclaim Defendant Eric Pavony (together, "Full Circle"), and Defendant and Counterclaim Plaintiff Bay Tek Entertainment, Inc. ("Bay Tek") jointly submitted a summary of *sub judice* motions and other applications on August 15, 2022 (ECF 130). Since submitting the summary, Full Circle has filed two new applications for relief. For the Court's benefit, and to comprehensively respond to the Court's directive, Full Circle wishes to update the joint summary. Accordingly, Full Circle respectfully submits an updated list of *sub judice* motions and other applications below:

- Bay Tek's Motion for Judgment on the Pleadings (ECF No. 33).
- Bay Tek's Motion to Strike Full Circle's Notice of Supplemental Authority in Opposition to Bay Tek's Motion for Judgment on the Pleadings (ECF No. 72).
- Full Circle's Objection to the Special Master's Order No. 1 (ECF No. 73).
- Full Circle's Motion for Leave to File a Third Amended Complaint (ECF No. 85).
- Bay Tek's Motion for Leave to File a Surreply in Further Opposition to Full Circle's Motion for Leave to File a Third Amended Complaint (ECF No. 97).
- Full Circle's Motion to Seek Relief from Paragraph 8 of the Stipulated Protective Order, ECF No. 57 (ECF No. 107).
- Bay Tek's Objection to the Special Master's Order No. 14 (ECF No. 118).
- The Parties' Letters for Extension of Time to Complete Discovery (ECF No. 122, 123).



- Bay Tek's Objection to the Special Master's Order No. 17 (ECF No. 127).
- Full Circle's Objection to the Special Master's Order No. 18 (ECF No. 137)
- Full Circle's Objection to the Special Master's Order No. 19 (ECF No. 138)

Thank you for your consideration.

Sincerely,

*/s/ Paul Thanasides*

Paul Thanasides

cc: All counsel or record (via ECF)

